

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
RAQUEL LAZO
3 Assistant Federal Public Defender
Nevada State Bar No. 8540
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702) 388-6261/Fax
6 Raquel_lazo@fd.org

7 Attorney for Jakarr Dudley

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAKARR DUDLEY,

15 Defendant.

Case No. 2:20-CR-037-GMN-NJK

STIPULATION TO CONTINUE
REPLY DEADLINE TO
GOVERNMENT'S RESPONSE (ECF
NO. 28) TO MOTION
TO SUPPRESS (ECF NO. 23)
(Third Request)

17
18 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.
19 Trutanich, United States Attorney, and Brian Y. Whang, Assistant United States Attorney,
20 counsel for the United States of America, and Rene L. Valladares, Federal Public Defender,
21 and Raquel Lazo, Assistant Federal Public Defender, counsel for Jakarr Dudley, that the reply
22 deadline to the Government's Response (ECF No. 28) to Defendant's Motion to Suppress (ECF
23 No. 23) currently scheduled for Wednesday, October 28, 2020, be vacated and set to Friday,
24 October 30, 2020.
25
26

1 This Stipulation is entered into for the following reasons:

2 1. In the last requested continuance, defense counsel represented that she did not
3 anticipate any further continuances. On or about the time the stipulation was requested, defense
4 counsel requested government counsel to produce additional discovery she believed was
5 relevant to the motion. The parties originally anticipated that the discovery would be produced
6 on Monday. Despite the government's diligence, there was a slight delay with obtaining the
7 requested discovery. Government counsel is expected to produce the documents to defense
8 counsel by this afternoon.

9 2. Accordingly, defense counsel now requests until Friday to review these
10 documents and complete her reply.

11 3. The defendant is not incarcerated and does not object to the continuance.

12 4. The parties agree to the continuance.

13 5. The additional time requested herein is not sought for purposes of delay, but
14 merely to allow counsel for defendant sufficient time within which to be able to effectively
15 prepare a reply.

16 6. Additionally, denial of this request for continuance could result in a miscarriage
17 of justice.

18 This is the third request to continue the reply deadline dates filed herein.

19 DATED this 28th day of October, 2020.

20
21 RENE L. VALLADARES
22 Federal Public Defender

NICHOLAS A. TRUTANICH
United States Attorney

23 */s/ Raquel Lazo*
24 By _____

25 RAQUEL LAZO
Assistant Federal Public Defender

/s/ Brian Y. Whang
By _____

BRIAN Y. WHANG
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JAKARR DUDLEY,

7 Defendant.

Case No. 2:20-CR-037-GMN-NJK

ORDER

8
9 **ORDER**

10 IT IS THEREFORE ORDERED that defense counsel's replies to the Government's
11 Response (ECF No. 28) to Defendant's Motion to Suppress (ECF No. 23) currently due on
12 Wednesday, October 28, 2020, be vacated and continued to Friday, October 30, 2020.

13 DATED this 28th day of October, 2020.

14
15 
16 _____
17 UNITED STATES MAGISTRATE JUDGE
18
19
20
21
22
23
24
25
26